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*Counsel for Delphi Salaried Retirees
Association Benefit Trust VEBA Committee*

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

DPH HOLDINGS CORP., *et al.*,

Reorganized Debtors.

Chapter 11

Case No.: 05-44481(RDD)

(Jointly Administered)

**MOTION TO WITHDRAW AS
COUNSEL**

PLEASE TAKE NOTICE THAT pursuant to Rule 2090-1(e) of the Local Rules of the United States Bankruptcy Court for the Southern District of New York, and upon the annexed Declaration of Abigail Snow, an attorney for The VEBA Committee for the Delphi Salaried Retirees Association Benefit Trust (the “VEBA Committee”) in the above-captioned action, Abigail Snow hereby moves for leave to withdraw as counsel. The VEBA Committee will continue to be represented by Timothy T. Brock of Duane Morris LLP, who has entered a notice of appearance in this case.

I hereby request that the Court grant my withdrawal and that my appearance be removed from the docket of this case and my name removed from the ECF distribution lists.

Dated: New York, New York
May __, 2020

DUANE MORRIS LLP

By: /s/Abigail Snow
Abigail Snow, Esq.
230 Park Avenue

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(212) 818-9200
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DECLARATION OF ABIGAIL SNOW

I, Abigail Snow, declare under penalty of perjury under the laws of the United States of America, including 28 USC §1746, that the following statements are true and correct.

1. I am Special Counsel with the law firm Duane Morris LLP and am one of the attorneys representing The VEBA Committee for the Delphi Salaried Retirees Association Benefit Trust (the “VEBA Committee”) in the above-captioned action.

2. I submit this Declaration in support of my motion to withdraw as counsel for the Foreign Representatives in the above-captioned matter.

3. On May 31, 2020, I will be retiring and ending my employment with Duane Morris LLP.

4. The Foreign Representatives will continue to be represented by Timothy Brock of Duane Morris LLP.

5. My withdrawal will not interfere with or require the extension of any deadlines set by the Court.

6. The foregoing is true and correct to the best of my knowledge.

Dated: May 29, 2020

By: /s/ Abigail Snow
Abigail Snow

CERTIFICATE OF SERVICE

I hereby certify that on May __, 2020, I caused to be electronically filed the foregoing document with the Clerk of the Court via CM/ECF. Notice of this filing will be sent by email to all parties by operation of the Court's electronic filing systems. Parties may access the filing through the Court's CM/ECF System.

Dated: May __, 2020

By: /s/ Abigail Snow
Abigail Snow

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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[PROPOSED] ORDER FOR WITHDRAWAL OF ABIGAIL SNOW AS COUNSEL

Upon the motion of Abigail Snow, for leave to withdraw as counsel (the “Motion”), and the Court having reviewed the Motion, and having determined that the legal and factual bases of the Motion establish sufficient cause for the relief requested therein, it is hereby:

ORDERED that the Motion is GRANTED; and it is further

ORDERED that Abigail Snow shall be removed as counsel of record for The VEBA Committee for the Delphi Salaried Retirees Association Benefit Trust (the “VEBA Committee”) and that the VEBA Committee will continue to be represented by remaining counsel, Timothy T. Brock of Duane Morris LLP.

Dated: June __, 2020
New York, New York

THE HONORABLE ROBERT D. DRAIN
UNITED STATES BANKRUPTCY JUDGE